

Case 1:22-cr-00240-AKH Document 140 Filed 01/23/24 Page U.S. Department of Justice

United States Attorney alc. Hope of Southern District of New York

The Jacob K. Javits Federal Building 26 Federal Plaza, 37th Floor New York, New York 10278

January 23, 2024

VIA ECF

The Honorable Alvin K. Hellerstein United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

> Re: United States v. Sung Kook (Bill) Hwang, et al., S1 22 Cr. 240 (AKH)

Dear Judge Hellerstein:

The Government respectfully writes, on behalf of the parties, in response to the Court's January 22, 2024 order (Dkt. 137) directing the parties to propose a pretrial schedule in light of the adjournment of the trial to May 6, 2024. The parties propose the following pretrial schedule, to supersede any previously ordered pretrial schedule. The items in bold have been set by the Court.

January 31, 2024	The Government provides the defense with supplemental expert disclosures.
February 7, 2024, 11 a.m.	Pretrial Conference
February 7, 2024	The defense provides the Government with any questions regarding the Government's supplemental expert disclosures.
February 14, 2024	The Government provides the defense with any responses to the defense's questions regarding the Government's supplemental expert disclosures.
March 4, 2024	The Government provides the defense with an updated exhibit list.
March 14, 2024	The defense provides the Government with supplemental expert disclosures.
March 21, 2024	The parties file any <i>Daubert</i> motions and any motions <i>in limine</i> .

March 25, 2024	The Government resumes providing the defense with material pursuant to Title 18, United States Code, Section 3500.
March 25, 2024	The Government provides the defense with an updated witness list.
April 4, 2024	The parties file any oppositions to <i>Daubert</i> motions and motions in <i>limine</i> .
April 8, 2024	The defense provides the Government with an exhibit list.
April 10, 2024	The parties file any replies in support of <i>Daubert</i> motions and motions in <i>limine</i> .
April 15, 2024	The defense provides the Government with a witness list.
April 16, 2024, 2:30 p.m.	Final Pretrial Conference
April 22, 2024	The defense provides the Government with material pursuant to Rule 26.2 of the Federal Rules of Criminal Procedure.
May 2024, 10 a.m.	Trial

The parties respectfully request that the Court permit the parties to file a letter by February 5, 2024 indicating whether any party has an issue to raise with the Court during the February 7, 2024 pretrial conference. If no party has an issue to raise, the parties respectfully request that the Court consider adjourning the February 7, 2024 pretrial conference until the April 16, 2024 final pretrial conference, and arraigning the defendants on the Superseding Indictment at the final pretrial conference.

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

By: <u>s/</u>

Matthew Podolsky Alexandra Rothman Samuel P. Rothschild Andrew Thomas Assistant United States Attorneys

Tel.: (212) 637-1947/-2580/-2504/-2106

Cc: Counsel of Record (via ECF)